

Holland & Hart LLP  
9555 Hillwood Drive, Second Floor  
Las Vegas, Nevada 89134

1 Patrick J. Reilly, Esq.  
Nevada Bar No. 6103  
2 Susan M. Schwartz, Esq.  
Nevada Bar No. 14270  
3 HOLLAND & HART LLP  
9555 Hillwood Drive, Second Floor  
4 Las Vegas, Nevada 89134  
Tel: (702) 669-4600  
5 Fax: (702) 669-4650  
Email: [preilly@hollandhart.com](mailto:preilly@hollandhart.com)  
6 [smschwartz@hollandhart.com](mailto:smschwartz@hollandhart.com)  
7 *Attorneys for Clark County Collection*  
8 *Service, LLC, Borg Law Group, LLC*  
*and Brooke M. Borg*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 HEATHER RIPANDELLI,

12 Plaintiff,

13 vs.

14 CLARK COUNTY COLLECTION SERVICE,  
15 LLC; BORG LAW GROUP, LLC; and  
BROOKE M. BORG,

16 Defendants.  
17  
18

Case No. : 2:16-cv-03015-KJD-VCF

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR  
DEFENDANTS TO FILE REPLY IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT AND  
OPPOSITION TO MOTION PURSUANT  
TO RULE 56(d) OF THE FEDERAL  
RULES OF CIVIL PROCEDURE**

**(Second Request)**

19 **STIPULATION**

20 Plaintiff Heather Ripandelli ("Plaintiff") and Defendants Clark County Collection  
21 Service, LLC, Borg Law Group, LLC, and Brooke M. Borg (hereinafter collectively referred to  
22 as "Defendants"), by and through their respective counsel of record, hereby stipulate and agree  
23 as follows:

24 1. On January 30, 2017, Defendants filed a Motion For Summary Judgment (Dkt. 4)  
25 in the above-entitled action.

26 2. On February 20, 2017, Plaintiff filed a Response in Opposition to Defendant's  
27 Motion for Summary Judgment and Motion Pursuant to Rule 56(d) of the Federal Rules of Civil  
28 Procedure. Dkts. 8, 9.

3. After providing additional materials to Plaintiff, Defendants offered to Plaintiff the opportunity to supplement her Opposition brief.

4. On March 3, 2017, while Plaintiff considered filing a supplemental brief, Plaintiff and Defendants stipulated (first request) to extend the deadline for Defendants to file their Reply in Support of the Motion for Summary Judgment and Opposition to Plaintiff's Motion Pursuant to Rule 56(d) to Monday, March 20, 2017. Dkt. 10.

5. Plaintiff has since filed a Supplemental Opposition to Defendants' Motion for Summary Judgment, on Thursday, March 16, 2017. Dkt. 14.

6. Defendants shall have until **Monday, April 3, 2017** to file their Reply in Support of the Motion for Summary Judgment and Opposition to Plaintiff's Motion Pursuant to Rule 56(d).

7. This is the second request for an extension of this deadline made by the parties.

DATED this 16th day of March, 2017.

DATED this 16th day of March, 2017.

/s/ Michael Kind, Esq.

Michael Kind, Esq.  
KAZEROONI LAW GROUP, APC  
7854 W. Sahara Avenue  
Las Vegas, Nevada 89117

Sara Khosroadbadi, Esq.  
HYDE & SWIGART  
7854 W. Sahara Avenue  
Las Vegas, Nevada 89117

*Attorneys for Heather Ripandelli*

/s/ Patrick J. Reilly, Esq.

Patrick J. Reilly, Esq.  
Susan M. Schwartz, Esq.  
Holland & Hart LLP  
9555 Hillwood Drive, Second Floor  
Las Vegas, Nevada 89134

*Attorneys for Clark County Collection  
Service, LLC, Borg Law Group, LLC  
and Brooke M. Borg*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: March 31, 2017

Holland & Hart LLP  
9555 Hillwood Drive, Second Floor  
Las Vegas, Nevada 89134